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AT&T
OPENING STATEMENTS OF STACEY BLACK
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I. INTRODUCTION AND SUMMARY

My name is Stacey Black. I am employed by AT&T, Inc., as an Executive Director – Market Development in its Government, Education and Medical Business Unit. My business address is 16331 NE 72ND WAY, REDMOND, WA 98052.

I have worked within the wireless industry for over 30 years split almost equally between the land mobile radio and cellular businesses. Prior to starting with AT&T Wireless in 2002, I worked at Motorola, AirTouch Teletrac (a pre-GPS vehicle location network), Sony Wireless, Siemens Wireless, and Airbiquity, a wireless telematics provider. My experience includes strategic planning, marketing and business development primarily in the state and local government segment.

My testimony explains AT&T's proposal for a Regional RFP structure in the D Block Spectrum Proceeding. This Proceeding addresses the need for a National Broadband Interoperable Public Safety Network in the 700 MHz band D Block Spectrum. The initial D Block auction failed because the structural requirements of the auction were unclear and there was little or no opportunity for potential bidders to receive an adequate return on their investment. AT&T has developed a proposal that we believe is the best path to providing public safety an interoperable broadband network.

AT&T agrees with the New York Police Department as well as other commenters in this proceeding that there is "no business case for a commercial wireless network operator to build a nationwide network that will meet public safety coverage and survivability standards". Given this reality, and our continuing support of the goals of the Public/Private Partnership, AT&T has proposed that rather than auction the D block, the FCC should issue the D block license to the PSBL and have them develop interoperability specifications and guidelines for a Request for Proposal (RFP) process on a regional basis. The use of regional RFP's would facilitate the development of partnerships between public safety and private entities to build regionally-based networks using the PSBL-developed national interoperability standards and requirements. Accordingly, we also recommend that the FCC remove the prohibition of local agencies from constructing their own broadband networks in the 700Mhz band as long as they conform to the national interoperability standards and requirements created by the PSBL.

In comments to the 2nd Further Notice of Proposed Rulemaking, many cities, including New York, Philadelphia, San Francisco and our nation's capital, shared a common request for a regional approach to the Shared Wireless Broadband Network (SWBN). These requests were not surprising, as the Cities point out, that a nationwide network will delay the deployment of the SWBN for many years, and may not meet the needs of individual cities or regions it is intended for. However, all commenters agreed that there needs to be a national view, along with the development of interoperability and priority access standards to insure that SWBN devices will be able to seamlessly roam onto visiting networks.

II. AT&T BELIEVES A REGIONAL APPROACH IS THE BEST PATH FOR CREATING A PUBLIC/PRIVATE PARTNERSHIP THAT WILL RESULT IN THE DEVELOPMENT OF A SHARED WIRELESS BROADBAND NETWORK.

It is with this backdrop that led AT&T to believe a regional approach is the best path to creating a public/private partnership that will result in the development of an interoperable broadband network. While there are many dimensions to our proposal, I am limiting my testimony this morning to what we call a national plan with a regional scope.

A single, nationwide PSBL is critical in the development of requirements and standards to insure that interoperability occurs not only at the physical air interface, but also in implementation of QoS and priority access, encryption techniques and the various public safety software applications that will also need to be standardized in order to achieve application interoperability. AT&T believes the PSBL should also be responsible for frequency coordination and spectrum leasing in the construction of private 700 MHz broadband networks and should play a crucial role in insuring these privately-built networks will also interoperate with the SWBN. AT&T also believes a very important and ongoing role for the PSBL will be in the processing, authenticating, and assignment of priority levels to users requesting priority access credentials on the SWBN.

To be truly effective however, the public/private partnership must occur on a local level. AT&T believes this to be the fastest and most effective way to provide broadband service to public safety for the following reasons:

- A regional scope gives local public safety agencies the ability to choose a broadband solution that meets their individual needs. Whether it entails using a commercial network, building a private network, or entering into a public/private partnership agreement with a commercial operator, the local entity is best suited to make that determination – not a national entity.
- By leveraging a commercial partner's existing facilities, local public safety entities can expedite the deployment of wireless

broadband facilities without having to wait for a nationwide 700 MHz network to be constructed or devices to be developed.

Though local negotiations or an RFP process, local entities can focus on requirements that are unique to them.

- A national plan for interoperability and other standards, combined with a local approach to network buildout is an easier business case to make for the commercial partner than being forced to commit to a nationwide network buildout.

One of the arguments against the regional approach is that it could lead to disparate radio access technologies which in turn would prevent interoperability. AT&T has two perspectives on this argument.

First, our research indicates that public safety, at least initially, intends to use the SWBN for data applications – not voice. This perspective is supported by a study of 614 first responder organizations that AT&T commissioned last October, where we asked how they would use broadband services if available. While the answers differed a little between Fire/EMS and law enforcement, the general answers were that the network would be used for computer-aided dispatch and database inquiries 50% of the time, followed by report filing at 29%, and internet access and email coming in third at 18%. General Communications/talking was at the bottom of the list at 2%. Since broadband networks use the TCP/IP standard, they support data communications regardless of the device or network. So while a GSM user device may not be able to access a CDMA network directly, it can send and receive data communications to any CDMA, WiMAX, and WiFi devices, as well as any computer, that is connected to the internet. Given the broad range of roaming agreements and the fact there are only two cellular technologies in use today, the chances are small that a first responder will roam into an area not supported by the device they are carrying.

Second, we believe that leveraging existing infrastructure and providing early access to public safety, far outweighs the economic uncertainty, and long deployment time of a nationwide network using a common air interface. We believe a sounder approach is to use commercial networks today, and to add 700 MHz radio access infrastructure to our existing core networks at a later time when devices and infrastructure are readily available and that meets the standards and specifications developed by the PSBL.

III. AT&T IS PROPOSING AN RFP STRUCTURE DESIGNED TO RESULT IN THE CONSTRUCTION OF A NATIONAL PUBLIC SAFETY SHARED WIRELESS BROADBAND NETWORK BUT PROVIDE FOR THE UNIQUE REQUIREMENTS OF INDIVIDUAL REGIONS.

Turning back to the discussion of a national plan, as part of its responsibilities, the PSBL should be required to develop a multi-phase plan that outlines the development of the SWBN from a near-term capability to a desired end-state over a period of time. This national plan for the SWBN should consider the fact that the network, or what some have called a "network of networks" will evolve over a period of time as regional public safety demands require. The RFP structure we are proposing is designed to develop a long term relationship with a commercial entity with an end state of a 700 MHz public safety broadband network that provides for a common air interface as well as seamless roaming from other public safety broadband network devices and commercial networks. With the exception of PSBL interoperability requirements, an RFP can be adapted to the needs of the region it is intended to serve and provide a choice of network options, including building a private network. The plan should encourage the use of an RFP as the preferred mechanism to establishing a local public / private partnership with existing commercial operators. The resulting agreement would include a set of deliverables over a period of time, in consideration for the commitment of subscribers by the local public safety entity.

Potential phases of the RFP could be established as near-term, mid-term and end-state requirements. Near-term requirements of the RFP should presume the use of existing commercial networks that meet certain minimum requirements, such as using TCP/IP for data interoperability, backup power at critical network nodes, service level agreements, outage recovery procedures and the like. Mid-term additions to the RFP would include negotiated coverage enhancements, back up power additions, redundant backhaul and fiber diversity. The last phase of the RFP should conclude with 700 MHz end-state requirements heavily drawing upon PSBL guidelines that would include a common air interface choice for the 700 MHz Radio Access Network (i.e. LTE), QoS priority and encryption standards as well as support for next generation applications such as VoIP PTT, streaming video, and presence.

While AT&T recognizes Congressional legislative action will be necessary to implement an RFP approach, AT&T firmly believes an RFP will attract many commercial entities and allow them to utilize existing networks to buildout a Shared Broadband Wireless Network much more quickly than a national reauction of the D Block spectrum. AT&T also understands the PSST's concern over having to potentially deal with hundreds of regional partners that could become D block licensees under a regional auction or RFP scenario. Regardless of whether an auction or RFP approach is used, AT&T further suggests that the Commission to adopt a regionalization structure similar to, if not the same, of that of the Regional Planning Committees to assist the PSBL in its planning, communications, reporting and coordination. Additionally as part of the PSST liaison Committee, the NPSTC has a Regional District Chair organization that could be leveraged to further improve the span of control by reducing the number direct management reports to four, with each chair responsible for its respective set of RPCs.

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IV. CONCLUSION

In conclusion, AT&T's suggests rather than go down the slippery slope of trying to auction the D block, fund, build, and operate a multi-billion dollar network, the FCC should issue the D block license to the PSBL, eliminate the prohibition of private network construction, mandate the development of interoperability and QoS standards, and require the PSBL to develop a multi-phase national plan with a regional RFP approach. As a result, the public safety community will receive 20 MHz of dedicated broadband spectrum that it could lease to those regional entities that can afford a private 700 MHz network, or for a RFP-negotiated public private network sharing arrangement with a commercial operator to overlay on their core network. RFPs have established themselves as an effective motivator to the commercial community as my colleagues up here are well aware of. We are highly competitive with each other, and that works to public safety's advantage in terms of driving down cost and increasing value. AT&T's proposal is a cost-effective, market-driven approach to bringing broadband to the public safety community now, with an end state of a 700 MHz, interoperable radio access network in the future.